



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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September 13, 2021

**VIA ECF**

The Honorable Roanne L. Mann  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Felipe Rodriguez v. City of New York, et. al., 21 Civ. 1649 (AMD)(RLM)

Your Honor:

I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing defendants City of New York, Sgt. George Zaroogian (Ret.) Det. John Beisel (Ret.), Det. John Califano (Ret.), Det. Jerry Fennel (Ret.) and John Wilde (Ret.) in the above referenced matter. The parties write jointly to respectfully request that the Court execute the parties' agreed upon Confidentiality Stipulation and Protective Order, which is annexed hereto as Exhibit A.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman  
Senior Counsel

cc: All Counsel (via ECF)